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State Water Resources Control Board

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TO: Brian Baird, Ocean Program Manager
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Tom Howard

FROM: Tom Howard
Chief Deputy Director
EXECUTIVE OFFICE

DATE: JUL 9 2001

SUBJECT: COMMENTS ON THE DRAFT POLICY ON COASTAL EROSION (DRAFT POLICY)

The State Water Resources Control Board (SWRCB) is pleased to provide the following comments on the Draft Policy. The SWRCB fully supports the Resources Agency's efforts to establish a uniform policy for erosion protection of the California coast.

The Draft Policy addresses a broad spectrum of erosion related issues, most notably the need to reduce erosion from lands adjoining the ocean and to increase the transport of sand from inland sources to ocean beaches. Examples of measures embraced by the Draft Policy to address these issues include stricter regulation of coastal development, designation of nondevelopment zones in sensitive coastal areas, and use of "soft" protection techniques to control shoreline erosion. These measures are generally consistent with management measures contained in the *Plan for California's Nonpoint Source Pollution Control Program* (NPS Program Plan) implemented by the SWRCB and the Regional Water Quality Control Boards (RWQCBs).

Consistent with our responsibilities as defined by the Clean Water Act (CWA) and the Porter-Cologne Water Quality Control Act, our comments regard the relationship between the Draft Policy and the protection of water quality. The Draft Policy fails to acknowledge that the protection of water quality is an inherent requirement of any sediment management program. The term "water quality" does not appear in the Draft Policy. The SWRCB and the RWQCBs are responsible for maintaining water quality necessary to sustain "beneficial uses." Under Section 303(d) of the CWA, water bodies that are unable to support their respective beneficial uses are designated as impaired, and measures are mandated to restore water quality.

Natural weathering and erosion are the primary sources of the sand that replenishes California's beaches. The transport of sand from its origin to the coast and ultimately to the ocean floor is a continuous process. However, for reasons not wholly understood at this time, the rate of beach replenishment has declined to the extent that sand must be artificially imported to some beaches to offset the loss to the ocean. Restoring sediment transport, particularly sand, through California's river systems is an implicit objective of the coastal erosion control plan.

Sediment, however, can also be a potential water quality contaminant subject to regulation by the SWRCB and the RWQCBs. Sediment consists of particles ranging from fine silts to larger particles of sand and gravel. At naturally occurring levels, these particles are an integral component of the aquatic environment. Sediment can be a source of nutrients and provides the strata that is the stream or ocean bottom. Virtually all aquatic organisms require sediment or some product of sediment to survive. However, at elevated levels, sediment becomes damaging to the aquatic environment. This situation is dramatically demonstrated in coastal watersheds where sediment has been implicated as a primary cause of declining salmonid populations. Elevated levels of silt bury gravel beds used for spawning, smother fry, and clog the gills of migrating fishes.

Except for seasonal and isolated instances, sediment is not a significant impairment to California's coastal marine waters. However, some streams in the State are designated as impaired by elevated sediment levels that contribute to the loss or reduction of beneficial uses. When a stream is designated as sediment impaired, a "total maximum daily load" allocation is required to achieve an overall reduction in sediment generation from the watershed. Further, erosion control measures consistent with the NPS Program Plan are routinely required by the RWQCBs throughout the State to minimize erosion from areas disturbed by construction, timber harvesting, and other land disturbance activities. Unfortunately, most erosion control practices do not distinguish grain sizes. Measures to control sediment are designed to capture fine materials, which are often the primary cause of the impaired status, but in doing so, they also restrict the discharge of potentially desirable larger particles, such as sand.

We are aware of comments that imply erosion control measures mandated by the various RWQCBs contribute to the reduced input of sand into stream systems. However, the SWRCB does not believe this to be the case. Erosion control measures are designed to control erosion resulting from disturbance. Well-designed erosion control projects may achieve "pre-disturbance" conditions, but it is extremely unlikely that our programs could reduce sediment transport below historic background levels. It is our contention that the damming of major streams is a primary cause of reduced levels of sand and gravel being transported to the coast. Dams interrupt the natural migration of coarse sediments, capturing them in water supply and flood control reservoirs. Flood control structures reduce peak storm flows, eliminating hydrologic conditions capable of moving larger particles along the streambed. Urban development further contributes to the reduced erosion and transport of sediment by covering

natural surfaces with impervious materials. The virtual absence of sand migration from the Los Angeles River exemplifies this condition. We do not believe that efforts to increase sediment introduction through the easing of erosion control practices can realistically compensate for the interruption of sediment transport that currently exists.

In summary, we wish to reiterate the SWRCB's strong support of the Draft Policy. Protecting our coastal resources is of the highest priority. The absence of discussion of water quality is an oversight of the current Draft Policy. However, that deficiency can be easily remedied through reference to the NPS Program Plan, California Ocean Plan, and applicable RWQCB Basin Plans. Finally, the SWRCB embraces responsible soil stewardship as a viable means to protect our waterways from sedimentation. We feel strongly that our erosion control management measures do not significantly contribute to the problem of insufficient beach sand replenishment and do not conflict with the Draft Policy. Additional research is warranted to better define the sand replenishment cycle before effective action may be initiated to resolve the condition.

Thank you for the opportunity to review and comment on the Draft Policy. If we can be of further assistance, please telephone me at 341-5611.

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